

Exhibit 7

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHNNY FLORES, ARIEL GOMEZ and)
DERRICK LEWIS, for themselves and)
others similarly situated,)

Plaintiffs,)

v.)

MOTOROLA SOLUTIONS, INC. and)
VIGILANT SOLUTIONS, LLC,)

Defendants.)

Case No. 1:20-cv-01128

Judge Charles R. Norgle, Sr.

**MOTOROLA SOLUTIONS, INC.’S AND VIGILANT SOLUTIONS, LLC’S
FIRST SET OF REQUESTS FOR ADMISSION TO DERRICK LEWIS**

Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC serve the following First Set of Requests for Admission to Derrick Lewis and demand that he provide written answers in accordance with Federal Rules of Civil Procedure 26 and 36 within thirty (30) days after service.

DEFINITIONS

1. “You” and “Your” means Derrick Lewis.
2. “Mugshot” means a photograph of a person’s face, taken for an official purpose by law enforcement agencies or correctional authorities.
3. “This Litigation” means the above-captioned case.
4. “Action” means any legal proceeding of any kind.
5. Whenever used herein, the singular shall be deemed to include the plural, and the plural shall be deemed to include the singular; the masculine shall be deemed to include the feminine, and the feminine shall be deemed to include the masculine; the disjunctive (“or”) shall be deemed to include the conjunctive (“and”), and the conjunctive (“and”) shall be deemed to

include the disjunctive (“or”); and each of the functional words “each,” “every,” “and,” and “all” shall be deemed to include each of the other functional words.

INSTRUCTIONS

1. For any Request that You refuse to answer in full or for which You deny any part, please specify the part admitted, and qualify or deny the remainder.

2. For each Request that is denied, or otherwise not admitted without qualification, please set forth in detail the reason for each such denial or qualification.

3. If You fail to respond or object to any Request within 30 days of the service of the Requests, the matter shall be deemed admitted.

4. If You answer a Request by claiming that You lack sufficient information to respond, please describe any and all efforts You made to become informed of the facts and circumstances necessary to answer or respond.

5. If You object that a term or phrase is ambiguous, please respond with Your understanding of the term or phrase and specifically admit or deny the statement.

6. The following Requests are continuous in character and, therefore, require You to supplement Your answers if You obtain further information between the time You answer and trial.

REQUESTS FOR ADMISSION

1. Admit that Your Mugshots were taken lawfully during Your arrests by the Chicago Police Department in 2004 and 2007.

ANSWER:

2. Admit that Your Mugshots are lawfully made available in the public domain by state or local law enforcement.

ANSWER:

3. Admit that Your Mugshots were taken lawfully by the Illinois Department of Corrections in connection with Your incarceration.

ANSWER:

4. Admit that Your Mugshots were lawfully made available in the public domain by the Illinois Department of Corrections.

ANSWER:

5. Admit that Your Mugshots remain in the public domain.

ANSWER:

6. Admit that You have not taken personally any action to have Your Mugshots removed from the public domain.

ANSWER:

7. Admit that You are not aware of any circumstance in which Your image has been identified from the FaceSearch database by anyone.

ANSWER:

8. Admit that You never complained in writing to anyone regarding your alleged concern that your biometric information had been captured prior to this Litigation.

ANSWER:

9. Admit that You never contacted any Defendant about your Mugshots prior to this Litigation.

ANSWER:

10. Admit that You never contacted any Defendant about your biometric information prior to this Litigation.

ANSWER:

11. Admit that You never contacted the Chicago Police Department about Your Mugshots prior to this Litigation.

ANSWER:

12. Admit that You never filed any Action to remove Your Mugshots from the public domain prior to this Litigation.

ANSWER:

13. Admit that You pled guilty to criminal offenses on multiple occasions.

ANSWER:

14. Admit that You interpret BIPA to prohibit federal law enforcement agencies from receiving, possessing or using biometric information related to Your face.

ANSWER:

15. Admit that You interpret BIPA to prohibit state law enforcement agencies within the United States, other than Illinois state law enforcement agencies, from receiving, possessing or using biometric information related to Your face.

ANSWER:

Dated: June 22, 2021

Respectfully submitted,

MOTOROLA SOLUTIONS, INC. and
VIGILANT SOLUTIONS, LLC

/s/ Andrew W. Vail

One of Defendants' Attorneys

David C. Layden
dlayden@jenner.com
Andrew W. Vail
avail@jenner.com
JENNER & BLOCK LLP
353 N. Clark St.
Chicago, Illinois 60654

CERTIFICATE OF SERVICE

I, Andrew W. Vail, an attorney, hereby certify that, on June 22, 2021, I served the foregoing document via electronic email delivery upon:

Michael Kanovitz
Scott R. Drury
Elizabeth Wang
LOEVY & LOEVY
311 North Aberdeen, 3rd Floor
Chicago, Illinois 60607

/s/ Andrew W. Vail

One of Defendants' Attorneys